

Army World Wide Environmental and Energy Conference 2000

Training at FLW Under a Very
Restrictive Air Permit
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Purpose

- Highlight the systems approach to which FLW attempts to train to standard under the terms of a very restrictive permit.

Agenda

- Bottomline
- Background
- Terms of the Permit
- Impact on Training
- DTLOMS Approach

Bottomline

- Ft. Leonard Wood is currently complying with the terms of an Air Permit at considerable expense to the taxpayer and with some degradation to training standards
 - Not a success story for either the environment or for training

Background

- OCT '99, BRAC brings Chemical and MP training to FLW
- Environmental Community concerned about live chemical agent training associated with Chemical School
- Environmental Coalition sues the state to enforce controls on PM10 emissions for all new training activities
- EPA computer model is used to predict PM10 emissions under terms of federal air permit
- Model over-estimates actual PM10 emissions by several orders of magnitude—significant impact to training
- Meteorological conditions rarely support required training

Training Impacts

- Fog Oil Training most significantly impacted
 - 28,000 gal/yr at FMC
 - 6,800 gal/yr at FLW
- Every Chemical 2LT will not lay smoke to standard
- MP Training adversely impacted 86 % of the time
- Chemical Training adversely impacted 68% of the time
- Degraded training has become the acceptable standard
- Over \$3 million spent on compliance requirements in the first year

DTLOMS

- Doctrinal
- Training
- Leadership
- Organization
- Material

Doctrine Solutions

- Incorporate compliance requirements in FLW range ops regulation
- Define, disseminate, and integrate terms across various regulations, documents, etc.
- Assess and incorporate Environmental Risk in Risk Management Plan and FLW Reg 385-5
- Incorporate environmental-related training requirements in FLW Reg 200-1

Training Solutions

- Develop FLW air permit compliance course
- Conduct a job analysis and link it to training requirements
- Plan alternate training in the event of unfavorable meteorological conditions
- Develop compliance check list for Range Control inspectors
- Publish Leaders' "Smart Cards"

Leadership Solutions

- CG Policy letter on permit compliance
 - Includes env hazards risk management
- Hold violators accountable
- Assess unit permit compliance posture through OIP inspection program
- Require all leaders to be compliance course qualified

Organization Solutions

- Staff all environmental support positions at 100%
- Ensure all Range Control Personnel are cross-trained in Environmental duties
- Civilianize Environmental Support positions in Range Control

Material Solutions

- Develop Fog Oil Simulator
- Collect empirical data to support premise that model grossly exaggerates actual PM10 emissions
- Establish hard/software upgrades
- Procure Uninterrupted Power Supply (UPS) system for Range Division
- Asphalt MP convoy area (14 miles)

Questions?